



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



March 3, 2011

Mr. Samuel Borries, On-Scene Coordinator
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SE-5J)
Chicago, Illinois 60604-3507

Dear Mr. Borries:

SUBJECT: Former Plainwell Impoundment Spring 2010 Bank Conditions Monitoring Report
for the Allied Paper/Portage Creek/Kalamazoo River Superfund Site, Allegan and
Kalamazoo Counties, Michigan

The following comments are provided by the Michigan Department of Natural Resources and Environment (DNRE) regarding the Former Plainwell Impoundment Spring 2010 Bank Conditions Monitoring Report for Federal and State Review prepared by Arcadis, dated January 2011. This report was prepared for the Kalamazoo River Study Group in accordance with the Administrative Order by Consent for Removal Action

1. The 2010 transects are truncated when compared to previous years' surveys. An explanation for why data was collected in such a limited fashion should be explained in the report. Future data collections need to include the full bank transect so comparison is possible.

4.2

2. Section 4.1.1 Comparison of Surveyed Banks – The text descriptions in this section of the report are inconsistent. Many of the bank profiles show erosion of material between the 2009 and 2010 monitoring event, but the text fails to indicate erosion occurred (e.g., T-2S, T-4N, T-4S, T-6S). Also, in many other descriptions, the erosion is "qualified" with no clear reason as to why the erosion is being downplayed. Additionally, the issue of the truncated bank profiles also plays into limiting the utility of the descriptions. It is suggested that more accurate descriptions be provided in the text in a more consistent fashion and carried forward in subsequent reports.

The DNRE appreciates the opportunity to provide comment on the report. If you have any questions regarding these comments, please feel free to contact me at the number below.

Sincerely,

Paul Bucholtz
Project Manager
Specialized Sampling Unit
Superfund Section
Remediation Division
517-373-8174

US EPA RECORDS CENTER REGION 5



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cc Mr. Stephen Garbaciak, Arcadis
Mr Garry T. Griffith, Georgia-Pacific
Mr. James Saric, United States Environmental Protection Agency
Ms. Daria W Devantier, DNRE